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Attorneys for Respondent

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

KIPLAND KINKEL,

Petitioner,

v.

GERALD LONG,

Respondent.

Case No. 6:11-cv-06244-AA

DECLARATION OF SAMUEL A.  
KUBERNICK IN SUPPORT OF  
UNOPPOSED MOTION FOR EXTENSION  
OF TIME

I, Samuel A. Kubernick, declare:

1. I am an attorney licensed to practice law in the State of Oregon and an Assistant Attorney General for the State of Oregon.

2. I am the assigned attorney representing respondent in the above-captioned case.

3. Petitioner filed his *Motion to Expand the Record* on March 13, 2021. By the accompanying motion, I am requesting a 14-day extension of time, to and including **April 12, 2021**, within which to file the reply.

4. This motion is made because respondent believes it necessary to respond to petitioner's filing, and more time is needed to research and prepare the response. In addition, undersigned counsel is out of the office on pre-scheduled leave for the week of March 22, 2021, and needs additional time following his absence to consult with his supervisor and colleagues regarding petitioner's motion.

5. Pursuant to Local Rule 7-1(a), counsel for respondent certifies that the attorney for petitioner, Thad Betz, has been contacted and he does not object to this motion.

6. Therefore, respondent respectfully requests leave to file a reply to petitioner's *Motion to Expand the Record* for a 14-day extension of time, to and including **April 12, 2021**, within which to file the response

DATED March 23, 2021.

Respectfully submitted,

FREDERICK M. BOSS  
Deputy Attorney General

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